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7 *Attorneys for Farmers Insurance Exchange*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 ELIZABETH GARRIDO, individually and on
behalf of all those similarly situated,

11 Plaintiff,
12 v.

13 FARMERS AUTOMOBILE INSURANCE
ASSOCIATION, FARMERS INSURANCE
EXCHANGE, DOES 1 through 10;

15 Defendants.

Case No.: 2:21-cv-00440-JCM-BNW

**STIPULATION AND PROPOSED ORDER
REGARDING WAIVER OF SERVICE,
EXTENSION OF TIME TO RESPOND TO
COMPLAINT, AND STAY OF
DISCOVERY**

16 Plaintiff Elizabeth Garrido ("Plaintiff") and Defendant Farmers Insurance Exchange
17 ("FIE") (collectively the "Parties"), by and through their respective counsel of record, agree as
18 follows:

19 1. Plaintiff filed its complaint in the Eighth Judicial District Court of Clark County,
Nevada, in the action styled *Garrido v. Farmers Automobile Insurance Association, et al.*,
21 Case No. A-21-829905-C (the "Complaint").

22 2. FIE removed this action to this Court on March 17, 2021.

23 3. Counsel for the Parties held a telephonic meet and confer on March 31, 2021 to
discuss service of the Complaint, FIE's anticipated response date, and discovery issues.

25 4. Pursuant to Fed. R. Civ. P. 4(d), FIE hereby waives service, by and through its
26 counsel, of the Complaint and Summons. This waiver shall not operate to waive, release,
27 compromise, or prejudice any rights, defenses, objections, arguments, or claims FIE may have to
28 the lawsuit.

1 5. FIE shall answer or otherwise respond to the Complaint in this action by or before
2 May 14, 2021.

3 6. If FIE files a motion to dismiss or other motion, Plaintiff's opposition thereto shall
4 be due on or before June 14, 2021.

5 7. FIE's reply in support of the motion shall be due on or before July 9, 2021.

6 8. Pending resolution of FIE's forthcoming motion, the Parties agree and stipulate to
7 a stay of discovery including, but not limited to, any discovery obligations set forth in
8 Fed. R. Civ. P. 26 and LR 26-1, in order to preserve judicial and party resources.

9 9. If the Court denies FIE's forthcoming motion, in whole or in part, the Parties agree
10 to submit a Discovery Plan and Scheduling Order within thirty (30) days after entry of the Court's
11 order on the motion.

12 10. The Parties respectfully suggest that good cause exists to enter the above-noted
13 briefing schedule and enter the Parties' stipulated stay of discovery.

14 11. The Parties represent that this stipulation is sought in good faith, is not interposed
15 for delay, and is not filed for an improper purpose.

16 DATED this 9th day of April, 2021.

DATED this 9th day of April, 2021.

17 PISANELLI BICE PLLC

MATTHEW L. SHARP, LTD.

18 By: /s/ Jordan T. Smith

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23 Attorneys for Plaintiff

24 IT IS SO ORDERED.



25 UNITED STATES MAGISTRATE JUDGE

26 DATED: April 15, 2021

27 CASE NO.: 2:21-cv-00440-JCM-BNW

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